

Nashua Transit System

Title VI Program

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INTRODUCTION

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Overview of Nashua Transit System (NTS)

The Nashua Transit System (NTS) has provided public transportation services throughout the region since 1979 covering the most populated neighborhoods and most commercial and industrial areas. As the service grows to meet the changing needs throughout the region NTS has seen remarkable growth of nearly 10% per year. In Fiscal Year 2014, NTS had more than 495,000 passenger trips throughout all modes of transportation. To see the Routes and Services we provide please visit www.ridebigblue.com.

NTS Commitment to Civil Rights

This update of Nashua Transit Systems (NTS) Title VI Program has been prepared to ensure that the level and quality of Nashua Transit's fixed route and demand response services are provided in a nondiscriminatory manner and that the opportunity for full and fair participation is offered to Nashua Transit System riders and other community members. Additionally, through this program, NTS has examined the need for services and materials for persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English.

Nashua Transit is committed to ensuring that no person is excluded from participation in, or denied the benefits of, or subjected to discrimination in the receipt of any of Nashua Transit services on the basis of race, color or national origin, the contents of this program have been prepared in accordance with Section 601 of Title VI of the Civil Rights Act of 1964 and Executive Order 13116 (Improving Access to Services for Persons with Limited English Proficiency).



“No person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal assistance.”

—Civil Rights Act of 1964

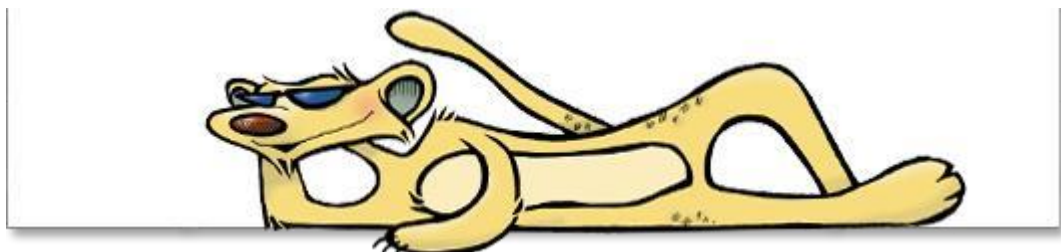
“Federal agencies are to examine the services they provide, identify any need for services to those with limited English proficiency, and develop and implement a system to provide those services so LEP persons can have meaningful access to them.”

—Executive Order 13166

Under the Civil Rights Act of 1964, and as a recipient of federal funding under the programs of the Federal Transit Administration (FTA) of the U.S. Department of Transportation (US DOT), NTS has an obligation to ensure that:

- The benefits of its bus services are shared equitably throughout the service area;
- The level and quality of bus services are sufficient to provide equal access to all riders in its service area;
- No one is precluded from participating in Nashua Transit System service planning and development process;
- Decisions regarding service changes or facility locations are made without regard to race, color or national origin and that development and urban renewal benefiting a community as a whole not be unjustifiably purchased through the disproportionate allocation of its adverse environmental and health burdens on the community's minority population; and
- A program is in place for correcting any discrimination, whether intentional or unintentional.

NTS has engaged the public in the development of this program. To develop a system to provide services to those with limited English proficiency, NTS engaged a number of community organizations and several riders.



GENERAL REQUIREMENTS

Notice to the Public

To make NTS's riders aware of its commitment to Title VI compliance, and of their right to file a civil rights complaint, NTS has presented the following language, in both English and Spanish, on its website www.RideBigBlue.com or <http://www.nashuanh.gov/transit> on posters at its Transit Center.

Your Civil Rights

Nashua Transit System (NTS) operates its programs and services without regard to race, color, and national origin in accordance with Title VI of the Civil Rights Act. Any person who believes they have been aggrieved by any unlawful discriminatory practice under Title VI may file a complaint with NTS. For more information on Nashua Transit System civil rights program and the procedures to file a complaint, please contact 603-821-2035; email clowc@nashuanh.gov or visit our administrative office at 11 Riverside Street, Nashua, NH 03062 from 8:00 am to 5:00 pm Monday through Friday. For more information about NTS programs and services, visit www.RideBigBlue.com.

Discrimination Complaint Procedures

NTS has established a process for riders to file a complaint under Title VI. Any person who believes that she or he has been discriminated against on the basis of race, color, or national origin by NTS may file a Title VI complaint by completing and submitting the agency's Title VI Complaint available at our administrative offices or on our website www.RideBigBlue.com or <http://www.nashuanh.gov/transit>.

The screenshot displays the Nashua Transit System (NTS) website. The header includes the NTS logo and navigation links: Home, About Us, NTS Fares, Paratransit & Senior Services, Route Maps & Schedules, Announcement & Alerts, Markie's Corner, NTS Newsletter, Quick Tips, and Contact Us. A dropdown menu for 'Paratransit & Senior Services' is open, showing 'Senior Services', 'Paratransit Services', and 'Title VI'. The main content area features a 'Trip Planner' widget on the left, a 'Markie Says' cartoon character, and a 'Title VI Plan' section. The 'Title VI Plan' text states: 'Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that "no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance" (42 U.S.C. Section 2000d). Nashua Transit System is committed to ensuring that no person is excluded from participation in, or denied the benefits of its transit services on the basis of race, color, or national origin, as protected by Title VI in Federal Transit Administration (FTA) Circular 4702.1.A. This plan was developed to guide Nashua Transit and its administration and management of Title VI related activities.' Below the text are links for 'TITLE VI PLAN' and 'TITLE VI POSTING'. At the bottom, there are links for 'Edit Content' and 'Settings', and a footer with 'NTS Home' and 'NTS Title VI'. A cartoon character is also visible at the bottom right.

The Procedure

Civil rights complaints should be filed immediately. However, NTS will investigate complaints up to 180 days after the alleged incident. NTS will process complaints that are complete. Once the complaint is received, NTS will review it and the complainant will receive an acknowledgement letter informing them whether the complaint will be investigated by Nashua Transit System

NTS has up to thirty days to investigate the complaint. If more information is needed to resolve the case, the NTS may contact the complainant. The complainant has thirty days from the date of the letter to send requested information to the investigator assigned to the case.

If Nashua Transit System investigator is not contacted by the complainant or does not receive the additional Information within thirty days, NTS can administratively close the case. A case can be administratively closed also if the complainant no longer wishes to pursue their case.

After the investigator reviews the complaint, one of two letters will be issued to the complainant: a closure letter or a letter of finding (LOF). A closure letter summarizes the allegations and states that there was not a Title VI violation and that the case will be closed.

A LOF summarizes the allegations and the interviews regarding the alleged incident, and explains whether any disciplinary action, additional training of the staff member, or other action will occur. If the complainant wishes to appeal the decision, she/he has ten days after the date of the letter or the LOF to do so.

A person may also file a complaint directly with the Federal Transit Administration, at:

Federal Transit Administration
Office of Civil Rights
1200 New Jersey Avenue SE Washington, DC 20590.
Title VI Complaint Form

If you need assistance completing this form due to a physical impairment or other reasons, please contact us by phone at (603) 821-2035 or via Fax (603) 821-2042.

Active Lawsuits, Complaints or Inquiries Alleging Discrimination

NTS maintains a list of active investigations conducted by FTA and entities other than FTA, including lawsuits and complaints naming NTS that allege discrimination on the basis of race, color or national origin. This list includes the date that the transit-related Title VI investigation, lawsuit or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit or complaint; and actions taken by NTS in response, or final findings related to the investigation, lawsuit, or complaint.

Active Lawsuits, Complaints or Inquiries Alleging Discrimination

Type (Investigation, Lawsuit, Complaint)	Date	Summary of Complaint	Status	Action(s) Taken
Commission on Human Rights and Opportunities Complaint	6/14/2013	Alleged discrimination disparate treatment due to disability on public transportation, by a bus operator.	Dismissed	Cased Closed with no findings.



NTS's PUBLIC PARTICIPATION PLAN

Key Principles

Nashua Transit System Public Participation Plan (PPP) has been prepared to ensure that no one is precluded from participating in Nashua Transit System service planning and development process. It ensures that:

- Potentially affected community members will have an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health;
- The public's contribution can and will influence Nashua Transit Systems decision making;
- The concerns of all participants involved will be considered in the decision-making process; and
- Nashua Transit System will seek out and facilitate the involvement of those potentially affected.

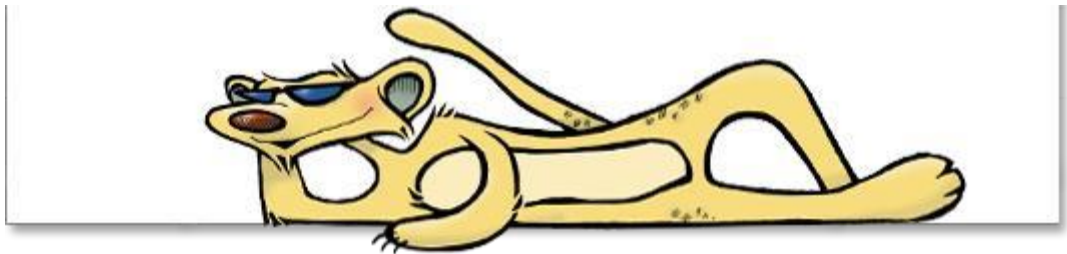
Through an open public process, NTS has developed a public participation plan to encourage and guide public involvement efforts and enhance access to Nashua Transit System transportation decision-making process by minority and Limited English Proficient (LEP) populations. The public participation plan describes the overall goals, guiding principles and outreach methods that NTS uses to reach its riders.

Limited English Proficient (LEP)

LEP refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

Early, Continuous and Meaningful

The steps outlined in the public participation plan offer early (in the planning process), continuous and meaningful opportunities for the public to be involved in the identification of social, economic and environmental impacts of proposed transportation decisions at NTS. It is a guide for how NTS engages its diverse community. NTS may continue to improve its public participation methods over time based on feedback from all of its riders and community members including low-income, minority and LEP populations as well as customer and community-based organizations.



Goals of the Public Participation Plan

- **Clarity in Potential for Influence** - The process clearly identifies and communicates where and how participants can have influence and direct impact on decision making.
- **Consistent Commitment** - NTS communicates regularly, develops trust with riders and our community and builds community capacity to provide public input.
- **Diversity** - Participants represent a range of socioeconomic, ethnic and cultural perspectives, with representative participants including residents from low income neighborhoods, ethnic communities and residents from Limited English Proficiency.
- **Accessibility** - Every reasonable effort is made to ensure that opportunities to participate are physically, geographically, temporally, linguistically, and culturally accessible.
- **Relevance** - Issues are framed in such a way that the significance and potential effect is understood by participants.
- **Participant Satisfaction** - People who take the time to participate feel it is worth the effort to join the discussion and provide feedback.
- **Partnerships** - NTS develops and maintains partnerships with communities through the methods described in its public participation plan.
- **Quality Input and Participation** - That comments received by NTS are useful, relevant and constructive, contributing to better plans, projects, strategies and decisions.

Objectives of the Public Participation Plan

Nashua Transit Systems Public Participation Plan is based on the following principles:

- **Flexibility** - The engagement process will accommodate participation in a variety of ways and be adjusted as needed.
- **Inclusiveness** - NTS will proactively reach out to and engage low income, minority and LEP populations from the NTS service area.
- **Respect** - All feedback will be given careful and respectful consideration.
- **Proactive and Timeliness** - Participation methods will allow for early involvement and be ongoing.
- **Clear, Focused and Understandable** - Participation methods will have a clear purpose and use for the input, and will be described in language that is easy to understand.
- **Responsiveness** - NTS will respond and incorporate appropriate public comments into transportation decisions.
- **Accessibility** - Meetings will be held in locations which are fully accessible; currently all meetings are held at City ADA accessible facilities.

NTS will use its public participation plan when considering fare changes, modifications to routes and schedules and other transit planning projects when:

- A fare increase or significant change in the method of fare payment is being considered;
- A new route is established;
- An existing route is proposed for elimination;
- Considering the total discontinuance of service on any line or group of lines on any given day when service is currently offered;
- Any system-wide change in service hours that exceeds (plus or minus) 10% of current total service hours;
- Routing on any given route or group of routes that affects more than 25% of the riders using the affected route(s); or
- Schedules are changed on any given route or group of routes that reduces the total number of one-way bus trips by more than 25% of the current number of bus trips.
- For minor schedule and service changes not rising to the level of those above, NTS will post service change notices on appropriate buses and stops sixty days in advance of the change date.

Regional Partnership/Capital Programming

For its capital programming, including major facility and bus procurements, NTS uses the Nashua Regional Planning Commission adopted public participation plan. This plan clearly indicates that the MPO's public participation process satisfies the NTS's public participation requirements for the Program of Projects. The notices for the regional Transportation Improvement Program (TIP) also state that the notice of public involvement activities and time established for public review of and comments on the TIP will satisfy FTA's program of projects requirement.

NTS's Public Participation Process

Outreach Efforts – Alerting Riders and Encouraging Engagement

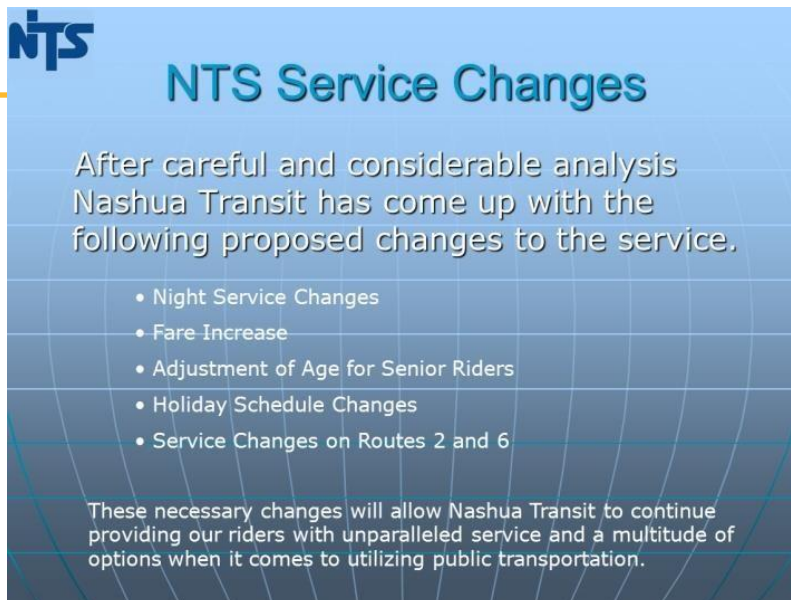
NTS's PPP includes many new mediums extending beyond the traditional approach which relied on legal notices and intermittent media coverage. NTS has availed itself of the communication methods more widely used by members of our community and riders.

1. A service/fare change proposal is developed internally or as a result of public comment;
2. A Title VI review of the proposal is conducted;
3. Public outreach venues, dates and times are determined with consideration of the proposed changes and their impact on specific locations/populations within the NTS service area;
4. Bilingual (English and Spanish) public outreach materials and a program are developed;
5. Outreach In advance of public information sessions is released;
6. An Email is transmitted to NTS community partners;
7. Local radio station interviews may be conducted (if available);
8. The public comment period ends;
9. The final service/fare change date is set;

Selection of Meeting Locations

When determining locations and schedules for public meetings, NTS will:

- Schedule meetings at times and locations that are convenient and accessible for minority and LEP communities;
- Employ different meeting sizes and formats including town hall type meeting formats;
- Coordinate with community organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected minority and/or LEP communities;
- Consider radio, television, or newspaper ads
- Provide opportunities for public transportation to all meetings.



The image shows a presentation slide for NTS (Nashua Transit System) titled "NTS Service Changes". The slide features the NTS logo in the top left corner. The main text reads: "After careful and considerable analysis Nashua Transit has come up with the following proposed changes to the service." Below this, there is a bulleted list of changes: "Night Service Changes", "Fare Increase", "Adjustment of Age for Senior Riders", "Holiday Schedule Changes", and "Service Changes on Routes 2 and 6". At the bottom, a concluding statement says: "These necessary changes will allow Nashua Transit to continue providing our riders with unparalleled service and a multitude of options when it comes to utilizing public transportation." The slide has a blue background with a grid pattern.

NTS

NTS Service Changes

After careful and considerable analysis
Nashua Transit has come up with the
following proposed changes to the service.

- Night Service Changes
- Fare Increase
- Adjustment of Age for Senior Riders
- Holiday Schedule Changes
- Service Changes on Routes 2 and 6

These necessary changes will allow Nashua Transit to continue
providing our riders with unparalleled service and a multitude of
options when it comes to utilizing public transportation.

NTS Mediums (Bi-lingual)

- Print – Newspapers
- Outdoor – Advertising on-board buses and in bus shelters
- Website – NTS has assembled a comprehensive website with automatic alerts
- Web-Based Feedback
- Social Media – NTS uses Facebook and Twitter
- Newsletter
- Direct Mail to Community Partners
- Public Information Sessions
- Public Hearings
- Legal Notices

FACEBOOK



Addressing Comments

The Incorporation of Public Comments into Decisions

All comments received through the public participation plan are given careful, thoughtful consideration. Because there are a number of different ways riders or members of the community can comment on proposed service or fare changes (mail, email, social media, public meetings and others), all comments are assembled into a single document for presentation to the Nashua Transit System for consideration.

Identification of Stakeholders

Our Community Partners

Stakeholders are those who are either directly or indirectly affected by a plan, or the recommendations of that plan. Those who may be adversely affected, or who may be denied benefit of a plan's recommendation(s), are of particular interest in the identification of specific stakeholders. Stakeholders can come from a number of groups including general citizens/residents, minority and low-income persons, public agencies, and private organizations and businesses. While stakeholders may vary based on the plan or program being considered, NTS has assembled a listing of stakeholders with whom we regularly communicate through email and direct mail.

Stakeholder List

Any community organization or person can be added to NTS's stakeholder list and receive regular communications regarding service changes by contacting the NTS administrative office at 603-821-2035. Local organizations and businesses can also request that a speaker from NTS attend their regular meeting at the same number or through the NTS website www.RideBigBlue.com.

LANGUAGE ASSISTANCE PLAN

Improving Access for People with Limited English Proficiency

In order to ensure meaningful access to programs and activities, NTS uses the information obtained in a Four Factor Analysis to determine the specific language services that are appropriate. This analysis helps NTS to determine if it communicates effectively with LEP persons and informs language access planning.

The **Four Factor Analysis** is a local assessment that reviews the following:

1. The number or proportion of LEP persons eligible to be served or likely to be encountered by NTS;
2. The frequency with which LEP persons come into contact with NTS services and programs;
3. The nature and importance of Nashua Transit System services and programs in people's lives.
4. The resources available to NTS for LEP outreach, as well as the costs associated with that outreach.

Factor 1 - Number of LEP Persons in Service Region

The first step in determining the appropriate components of a Language Assistance Plan is understanding the proportion of LEP persons who may encounter Nashua Transit System services, their literacy skills in English and their native language, the location of their communities and neighborhoods and, more importantly, if any are underserved as a result of a language barrier.

To do this, NTS evaluated the level of English literacy and to what degree people in its service area speak a language other than English and what those languages are. Data for this review is derived from the United States Census Bureau "American Fact Finder" web portal data from 2011. Data was reviewed by Nashua Regional Planning Commission.

Nashua city, Hillsborough County,
New Hampshire
Estimate Margin of Error

Speak Only English	1,547	+/- 394
Speak Spanish	5,072	+/- 749
Speak English "very well"	2,198	+/- 405
Speak English "well"	1,109	+/- 283
Speak English "not well"	1,214	+/- 352
Speak English "not at all"	551	+/-236
Speak other language	33	+/- 55
Total:	6,652	+/- 793

Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value.

Nashua Area Overview

As of the census of 2010, [8] there were 86,494 people, 35,044 households, and 21,876 families residing in the city. The population density was 2,719.9 people per square mile (1,050.2/km²). There were 37,168 housing units at an average density of 1,202.8 per square mile (464.6/km²). The racial makeup of the city was 83.4% White, 2.7% African American, 0.3% Native American, 6.5% Asian, 0.03% Pacific Islander, 4.6% from some other race, and 2.5% from two or more races. Hispanic or Latino of any race was 9.8% of the population.

The Nashua Regional Planning Commission used 2014 American Community Survey data, to conduct a more specific analysis of languages spoken by residents of the City of Nashua, as well as the combined populations of Nashua, Hudson and Merrimack (communities with para-transit contracts with the City). According to this analysis, Spanish is spoken by 8.5% of Nashua's population and 5.9% of the combined populations of Nashua, Hudson and Merrimack. All relevant Nashua Transit System materials are translated into Spanish.

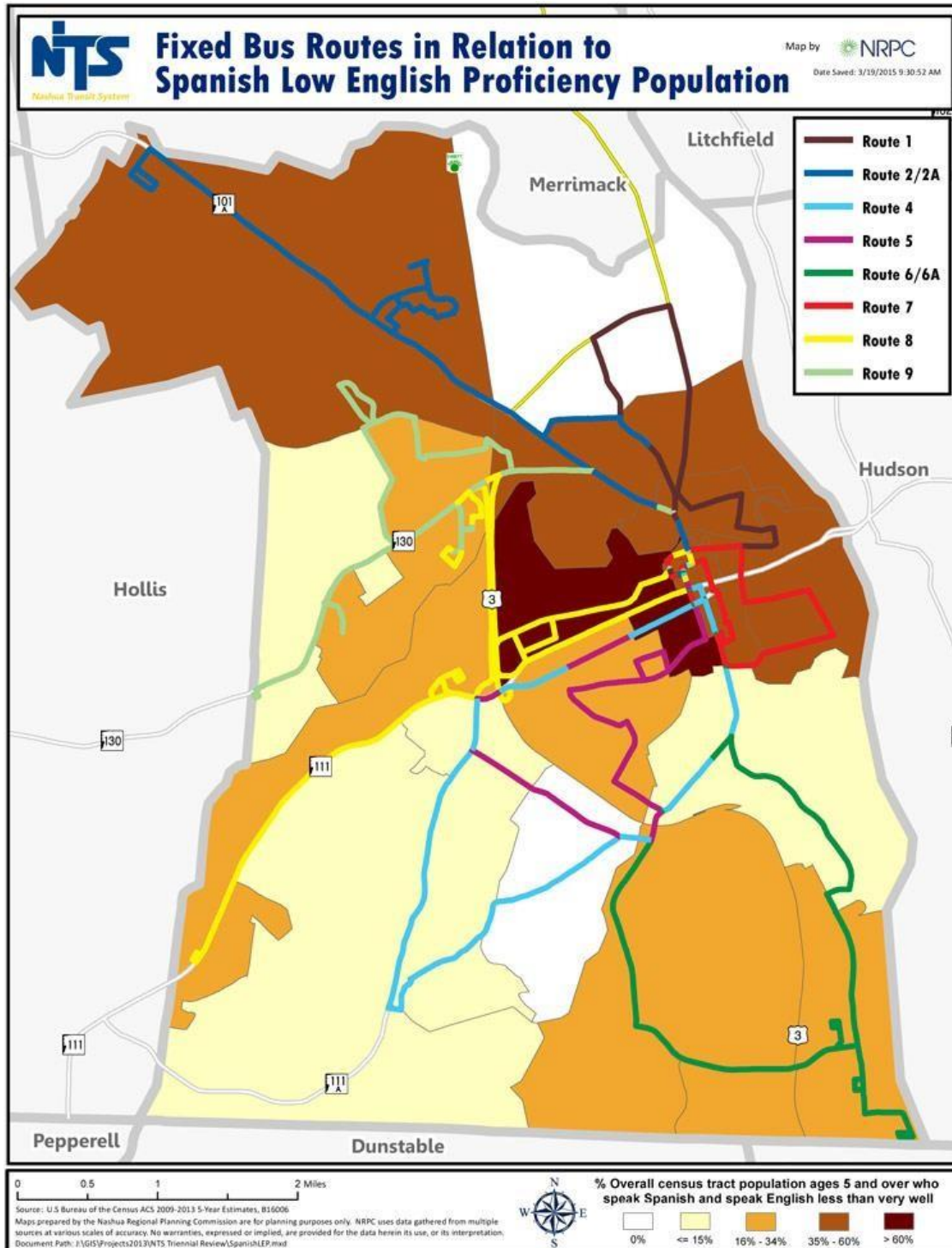
The next highest category is other Indo-European languages, which total 7.4% of the Nashua population and 6.4% of the combined populations of Nashua, Hudson and Merrimack. The Indo-European language category includes a total of 20 different languages with French coming in highest at 2% of Nashua's population as well as the combined populations of Nashua, Hudson and Merrimack. The French speaking population is generally comprised of older residents of French Canadian decent, who are generally fluent in English as well. All of the other remaining 19 categories comprised 1% or less of the total population.

In NTS's collective staff experience no customer has ever requested materials in any language other than English. In addition, we have the Google Translate app installed on tablets, in every bus, which enables a passenger to speak into the software and communicate in their language with the driver.

Based on Census data and passenger requests, NTS staff believe that our current practices meet the requirements above. NTS will continue to monitor census data updates and passenger requests to determine if additional language translation is needed in the future.

The Locations of the LEP Community

While the need to provide language services to the Spanish speaking population in the NTS service area is clearly demonstrated in the tables above; it is helpful to understand where in the service area populations of limited English proficiency reside. The map below provides a spatial display of residents who speak Spanish at home and report speaking English "less than well."



Factor 2 - Frequency of LEP Use

There are a large number of places where NTS riders and members of the LEP population can come into contact with NTS services including the use of fixed route and demand response buses, calls to customer service representatives, reservation agents and NTS's outreach materials. An important part of the development of NTS's Language Access Plan is the assessment of major points of contact, including:

- Communication with NTS's customer service staff;
- Bus ticket sales;
- Printed outreach materials;
- Web-based outreach materials;
- Public meetings;
- Demand response reservation agents;
- Local news media (print and radio);
- Automatic, service related audio announcements on-board NTS buses; and
- Service related posters at NTS's bus terminal.



Community Partners

As part of this assessment, NTS also contacted many of its community partners to assess the extent to which they come into contact with LEP populations. NTS asked the partner agencies to estimate the percent of clients they interact with who would have limited English proficiency using the following questionnaire:

Do you encounter non-English speaking/reading people who need your services? Of the respondents, many noted that they did encounter clients with limited English proficiency ranging from one or two to as many as half of their overall client base. Most of the respondents noted that the many of the clients spoke Spanish.

If so, what are the top three languages that you encounter?

The eleven respondents noted the following languages; Spanish, Portuguese, French.

How do you address language barriers?

Respondents use a variety of processes to address language barriers including bi-lingual staff, Language Line, translation services and family members.

Do you find language to be a barrier in preventing you from providing service?

While some expressed some difficulty in dealing with limited English skills, none of the respondents were prevented from providing their services as a result of a language barrier.

Community Partners

- Greater Nashua Mental Health
- Harbor Homes
- Nashua Senior Center
- Nashua Housing Authority
- Nashua Council on Aging
- Gateways
- Service Link
- Southern New Hampshire Medical Center
- Life Coping, Inc.
- Nashua Welfare Department
- Nashua Soup Kitchen
- State of New Hampshire Welfare Department

Consulting Directly with the LEP Population

In addition to the census data, internal survey of employees and outreach to community partners, NTS applied a survey to its riders asking the following questions:

- Languages spoken at home?
- Is language a barrier to accessing NTS services?
- Is language a barrier to accessing NTS outreach materials?
- Is language a barrier to access NTS customer service?
- Reasons for using bus service?

Of those riders who responded to the survey, applied in-person on-board and at the NTS bus station. When asked what language they spoke at home other than English (4%) reported Spanish.

When asked if language was a barrier to accessing NTS buses none reported that language impaired any access to using the overall system.

When asked if language is a barrier to accessing NTS customer service representatives (telephone and in-person). Those responding reported they have received assistance from our Spanish speaking drivers and dispatchers.

Rider's surveys were applied at the Nashua Transit Center in Downtown Nashua and on-board NTS services.


Factor 3: The Importance of NTS Service to People's Lives

Access to the services provided by NTS, both fixed route and demand response are critical to the lives of many in the region. Many depend on NTS's fixed route services for access to jobs and for access to essential community services like schools, shopping and medical appointments. Riders eligible for service under the American's with Disabilities Act (ADA) require service for the same reasons. Because of the essential nature of the services and the importance of these programs in the lives of many of the region's residents, there is a need to ensure that language is not a barrier to access.

If limited English is a barrier to using these services, then the consequences for the individual could limit their access to obtain health care, education or employment. Critical information from NTS which can affect access includes:

- Route and schedule information
- Fare and payment information
- Information regarding making the best use of the system (How To)
- Service announcements
- Safety and security announcements
- Complaint and comment forms
- Outreach related to opportunity for public comments
- Information about demand response services under the ADA and other special programs

Example: NTS Interior Signage

<u>Nashua Transit System</u> TITLE VI NOTICE TO THE PUBLIC	 <small>Nashua Transit System</small>	<u>Sistema de Trancito de Nashua</u> TITULO VI ADVIERTA AL PUBLICO
<hr/>		
<p>The Nashua Transit System (NH DOT) hereby gives the public notice of its policy to uphold and assure full compliance with Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and all related statutes. Title VI and related statutes prohibiting discrimination in Federally assisted programs require that no person in the United States of America shall, on the grounds of race, color, national origin, sex, age or disability be excluded from participation in, be denied benefits of, or be otherwise subjected to discrimination under any program or activity receiving Federal assistance.</p> <p>Any person who believes they have been aggrieved by an unlawful discriminatory practice regarding Nashua Transit System's programs has the right to file a formal complaint with the Nashua Transit System. Any such complaint must be in writing and submitted to the Nashua Director of Transit within one hundred eighty (180) days following the date of the alleged occurrence. For more information regarding civil rights complaints, please contact:</p> <p style="text-align: center;">Director of Transit Nashua Transit System 11 Riverside Street Nashua, NH 03062 603-821-2035</p>	<p>El Sistema de Trancito de Nashua da aviso publico de su politica de respetar y asegurar el pleno cumplimiento con el Titulo VI de la Ley de Derechos Civiles de 1964, la ley de Restauración de Derechos Civiles de 1987, y todo lo relacionado con estatutos. Titulo VI y relacionado con los estatutos Federales que prohijen la discriminación en Asistida programas requieren que ninguna persona en los Estados Unidos de América, por motivos de rasa, color, origen nacional, sexo, edad, discapacidad o ser excluido de la participación en, se le negara beneficios de, o ser de otra manera objeto de discriminación bajo cualquier programa o actividad recibiendo ayuda Federal.</p> <p>Toda persona que cree que ha sido perjudicada por una practica discriminatorias ilegal en relación con el Sistema de Trancito de Nashua el programa tiene derecho a presentar una queja formal con el Sistema de Trancito de Nashua. Algún reclamo debe hacerse por escrito y ser presentado al Director de Trancito de el Sistema de Nashua, dentro de ciento ochenta (180) días siguientes a la fecha de el evento ocurrido. Para mas información respecto alas quejas de derechos civiles por favor póngase en contacto con:</p> <p style="text-align: center;">Director de Trancito Sistema de Trancito de Nashua 11 Riverside Street Nashua, NH 03062 603-821-2035</p>	
www.RideBigBlue.com • 603-880-0100		

Improving Access for People with Limited English Proficiency

Factor 4: The resources available to NTS for LEP outreach, as well as the costs associated with that outreach.

Nashua Transit System has committed resources to improving access to its services and programs for LEP persons. Today, bilingual information (English/Spanish) is distributed in an extensive number of mediums including:

1. Bi-lingual English/Spanish dispatchers-drivers
2. Translation option on website
3. Outreach to several multi-cultural social service agencies to assure needs of clients are addressed
4. All materials are available in Spanish
5. All RouteMatch tablets in vehicles equipped with a “tablet translator” to instantly assist all translations needed at point of service

OUTCOMES

New tools and alerting riders of language assistance

Nashua Transit System has Spanish versions of all relevant documents and forms available on our website. While the Spanish speaking LEP population of the service area is well served, additional services are in place to assist other LEP populations regardless of the total population in the region. Nashua Transit System currently addresses this in the following ways:

- The City of Nashua provides translation services via Language Line Translation Service to provide confidential telephone interpretation service for more than 170 languages. This service can be utilized by employees when working with non-English speaking customers.
- Google Translate is also available via tablets on each Nashua Transit Service vehicle. Google Translate enables passengers to speak into the software and communicate in their language with the driver.

As opportunities arise, the Nashua Transit System would like to implement the following items:

- On-board announcements in Spanish as well as English.
- Offer employees conversational or transit specific language training; and
- Recruiting more multi-lingual employees.

Training Employees

As part of their regular training, NTS and First Transit employees are instructed and explained the outline of the LEP program, sensitivity to any person needing LEP assistance and all bus drivers are provided an English/Spanish dictionary as well as access to Google Translate on the tablets.

e needed.

DECISION MAKING BODIES

Service Review Committee

This employee-based internal committee is comprised of Bus Operators, supervisors and trainers. It meets regularly to discuss possible service modifications from the perspective of Operators. Membership is voluntary and open-ended (i.e. members are not appointed and they may serve for as long as they desire) and changes from time to time.

Passenger Advisory Committee (PAC)

This committee is open to the public and comprised of passengers representing various bus routes. At the bimonthly meetings, members discuss all aspects of Nashua Transit System services from the perspective of the public. This group offers an invaluable service to NTS. Membership is voluntary and open-ended (i.e. members are not appointed and they may serve for as long as they desire) and it changes from time to time. This group (Transit Matters) has been meeting for over 11 years.

There is no way of depicting the racial breakdown of the above referenced committee because it is open to the public and fluctuates monthly. Every effort is made to encourage minorities to attend Transit Matters and have a voice in the Title VI program. Below is a monthly meeting notice that is posted throughout all municipal offices, on all para-transit vans, and on all fixed-route buses.

The Next
Transit Matters
Meeting
will be held on
April 8, 2014
at 3:00pm at City Hall, Room 208

In addition to the Citybus, accessible transportation will be
available
to all registered riders that wish to attend. Please make
reservation at least 48 hours in advance.
603-880-0100

* We encourage all minorities to participate in the Transit Matters meeting.
We use this time to discuss any LEP/Title VI suggestions, complaints and
idea's. All are welcome and encouraged to attend! We would love to hear
from you!

SERVICE STANDARDS and POLICIES

NTS has developed a set of quantifiable service standards and policies. These service standards were updated in 2012 through a public participations process, approved by Nashua Transit System.

These service standards and policies include:

- Vehicle Load
- Headways (Frequencies)
- On-time Performance (Schedule Adherence)
- Service Availability
- Vehicle Assignment Policy
- Transit Amenity Policy



Example: Public Meeting Announcements



Service Standards Public Meeting

NTS is updating its service standards and would like your input. We have a series of service standards that are used to guide our planning and improve the service we provide. They are goals we work toward and service conditions that arise that alert us that service changes are needed. They cover things like on time performance, the locations of bus shelters, bus frequency, accessibility and the number of passengers on each bus.



Vehicle Load

Vehicle load is expressed as the ratio of passengers to the total number of seats on a vehicle.

Vehicle	Full Capacity	Description
207	51	2001 Gillig Low Floor 30'
208	51	2001 Gillig Low Floor 30'
209	51	2001 Gillig Low Floor 30'
210	51	2001 Gillig Low Floor 30'
211	51	2001 Gillig Low Floor 30'
212	51	2001 Gillig Low Floor 30'
213	51	2001 Gillig Low Floor 30'
214	55	2005 Gillig Low Floor 35'
215	47	2014 Eldorado EZ Rider II
420	21	2009 Arboc Mobilitiy Chevy Express 4x2
421	21	2009 Arboc Mobilitiy Chevy Express 4x2
422	21	2009 Arboc Mobilitiy Chevy Express 4x2
423	21	2009 Arboc Mobilitiy Chevy Express 4x2
424	21	2009 Arboc Mobilitiy Chevy Express 4x2
425	21	2009 Arboc Mobilitiy Chevy Express 4x2
426	21	2009 Arboc Mobilitiy Chevy Express 4x2
427	21	2009 Arboc Mobilitiy Chevy Express 4x2
415	21	2001 Eldorado Aerotech Ford E450
303	30	2010 Molly Trolley
302	30	2010 Molly Trolley
301	30	2010 Molly Trolley

Vehicle Headway (Frequency)

Vehicle headway is the amount of time between two buses traveling in the same direction on a given route. NTS buses are scheduled with a variety of frequencies based generally on demand. Routes are schedule in 30 and 60 minute frequencies.

Policy Headways and Periods of Operation

Service	Weekday Peak	Weekday Off Peak	Saturday	Saturday Off Peak	Sunday Peak	Sunday Off Peak
NTS Local and Express Services	30	30	30	30	No Service	No Service

On-Time Performance

Among the most important service standard for riders is on-time performance or adherence to published schedules.

- A vehicle is considered on time if it departs a scheduled time point no more than two minutes early and no more than 5 minutes late.
- Nashua Transit System on-time performance objective is 90% or greater.

Service Availability – Access to the Bus

NTS currently provides transit service so that 90% of all residents of the City of Nashua are within 1,300 feet (1/4 mile) walk of bus service. Consideration is given to new markets as demand warrants and as resources become available.

Vehicle Assignment Policy

With several practical considerations, NTS assigns buses to service so that average age of the buses serving each route does not exceed the average age of the fleet. Bus assignments take into account the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route.

Transit Amenity Policy

NTS has over 729 stops in the service area – many located and installed more than 20 years ago. Stops, shelters and benches will be placed according to industry standards with consideration of permitting and for local and special needs.

Monitoring Service Standards

For the on-going monitoring and measurement of service standards and policies, NTS uses the following schedule and methods.

Service Standard/Policy	Sample Schedule	Methodology
Vehicle Load	All Routes Bi-Annually	Automatic Passenger Counters on Fixed Route Buses
Vehicle Headways	Assessed Annually as Part of Service Planning	Automatic Vehicle Location System
On-Time Performance	Assessed Monthly	Automatic Vehicle Location system
Service Accessibility	Assessed Annually as Part of Service Planning	Planning Desk/Geographic Information System Review
Vehicle Assignment Policy	Assessed Quarterly	Automatic Vehicle Location System

Summary of Changes

Service Change Evaluations/Taking Action/Summary of Significant Service Changes Since 2009

Since Nashua Transit System 2009 Title VI Plan Submission there has been one fare change. There have been two service changes. These changes, added additional services to those defined in greater need in the area of LEP.



“The development and urban renewal befitting a community as a whole will not be unjustifiable purchased through the disproportionate allocation of its adverse environmental and health burdens on the community’s minorities”.

—Executive order 12898: Federal Actions to Address Environmental Justice in Minority and Low Income Populations

Construction Equity Analysis

When NTS plans to construct or expand a facility, such as a vehicle storage facility, maintenance facility, transit hub or operation center, the agency will include a copy of the Title VI Equity Analysis conducted during the planning stage with regard to the location of the facility. The following principles will be applied in the analysis:

1. To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations;
2. To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process; and
3. To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.
4. There were no projects required that displaced any individuals from their residence and businesses due to land acquisitions.

NTS will follow federal guidance provided in FTA Circular 4703.1 (August 2012).

PROGRAM SPECIFIC REQUIREMENTS

Title VI Monitoring (from 2010 Title VI Plan)

The results of the ongoing monitoring of service standards as defined in the Nashua Transit System 2009 program can be obtained by contacting NTS.

Sub recipient Compliance

During this report period, NTS did not engage with any sub recipients.

Equity Analysis for Facility

During the past three years, NTS has not constructed a vehicle storage, operations center or maintenance facility.

Demographic Service Profile

Because NTS operates fewer than 50 buses in peak service, a demographic service profile was not prepared for this plan update.

GRANTS, REVIEWS and CERTIFICATIONS

Pending Applications for Financial Assistance

Nashua Transit has no pending applications for financial assistance from any other agency other than FTA.

Pending FTA Grants

NH-90-X192-00 Support Vehicle

Open FTA Grants

NH-90-X133-01 FY08 CAPITAL, PLANNING AND OPERATING

NH-44-X001-00 Sandy Resilience Grant

NH-90-X179-00 FY13 CAPITAL PLANNING AND OPERATING

NH-90-X188-00 FY 14 CAPITAL, PLANNING AND PLANNING

NH-90-X191-00 FY 15 CAPITAL, PLANNING & OPERATING

NH-90-X190-00 JARC FY 14-15

Civil Rights Compliance Reviews in the Past 3 Years

Nashua Transit has no Civil Rights cases pending.

Recent Annual Certifications and Assurances

Nashua Transit has executed FY 2015 Certificates and Assurances to the FTA.

Previous Triennial Review Findings

Nashua Transit's 2013 Triennial Review resulted in no findings with respect to its Title VI Plan/activities.

CONTACT

This Title VI program was prepared by the Transportation Manager. For additional information on the Nashua Transit System Authority's Title VI Plan, or its efforts to comply with the Civil Rights Act of 1964 or Executive Order 13166 Improving Access to Services for Persons with Limited English Proficiency, please contact:

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